





March 10, 2020

BYECF

The Honorable Frederic Block Senior United States District Judge **United States District Court** Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. Renato Barca, Jr., et al. 19-CR-575 (FB)

Dear Judge Block:

We represent Renato Barca, Jr. in the above-referenced case.

On consent of the government and Pretrial Services, we are writing to respectfully request that the Court order a temporary modification to Mr. Barca's conditions of pretrial release to allow him to travel to Bear Creek, Pennsylvania, to visit a close family friend on March 13, 2020, and to return on March 14, 2020,

Mr. Barca's current conditions of release restrict his travel to New York City and Westchester County. Mr. Barca is also allowed to travel to Long Island, Rockland County, and New Jersey for employment purposes with prior notice to Pretrial Services. Additionally, Mr. Barca is permitted to travel to Long Island, Rockland County, Putnam County, and New Jersey to attend family matters with prior notice to, and approval by Pretrial Services. To date, Mr. Barca has fully complied with all of the conditions of his pretrial release.

We have discussed this application with Assistant United States Attorney Kayla Bensing and United States Pretrial Services Officer Chijioke Ezenvilimba, and neither the government nor the Probation Department objects to the proposed request.

We thank the Court for its consideration in this matter.

Respectfully submitted, /s/ Eric M. Creizman
Eric M. Creizman

cc: Kayla Bensing, Esq. (by email) Assistant United States Attorney

> Chijioke Ezenyilimba (by email) United States Probation Officer